

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

DOUGLAS F. CARLSON
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
(DFC/USPS-25-58)

June 18, 2001

Pursuant to POR C2001-1/1 and sections 25 and 26 of the *Rules of Practice*, I hereby submit interrogatories to the United States Postal Service. The instructions accompanying DFC/USPS-1-18 are incorporated herein by reference.

Respectfully submitted,



Dated: June 18, 2001

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

June 18, 2001
Santa Cruz, California

DFC/USPS-25. Please refer to the response to DFC/USPS-10.

- a. Please confirm that the average daily cancellation volume of First-Class Mail provided in USPS-LR-2 has, for most facilities, generally risen over time between 1992 and 2001. If you do not confirm, please provide the number of facilities for which the average daily cancellation volume generally has fallen over time between 1992 and 2001. (If necessary to remove any ambiguity in any part of this interrogatory, an average daily cancellation volume can be considered to have risen over time between 1992 and 2001 if the average daily cancellation volume in FY 2000 is higher than the average daily cancellation volume in 1992.)
- b. For facilities whose average daily cancellation volume of First-Class Mail has risen over time between 1992 and 2001, please confirm that reporting a ratio of cancellations on holidays to average daily cancellations in FY 2000 understates or underestimates the actual quantity of mail cancelled on holidays in the earlier years when average daily cancellation volume was lower than it was in FY 2000. If you do not confirm, please explain.
- c. For each holiday for each facility identified in USPS-LR-2, please provide the ratio of holiday cancellation volume to average daily cancellation volume for the fiscal year most recent to the holiday.
- d. For each holiday for each facility identified in USPS-LR-2, please provide the ratio of holiday cancellation volume to average Saturday cancellation volume for the fiscal year most recent to the holiday. If the average Saturday cancellation volume for the fiscal year most recent to the holiday is not available, please provide the ratio of holiday cancellation volume to average Saturday cancellation volume in FY 2000.

DFC/USPS-26. Please refer to the memo provided in response to DFC/USPS-3 and the data provided in USPS-LR-2. Please confirm that the only collection boxes that could properly have shown a holiday collection time during the period from December 25, 2000, to January 1, 2001, would be those collection boxes located in the service

areas of the P&DC's or P&DF's located in Milwaukee, WI, Fargo, ND, Bismarck, ND, Lincoln, NE, and Cleveland, OH. If you do not confirm, please explain fully.

DFC/USPS-27. Please refer to the response to DFC/USPS-9, where the response states, "After the elimination of routine Sunday collection and processing in 1988, it is possible that the mailing public implicitly began to associate collection and processing operations with days in which they receive delivery. In that case, the fact the holidays are days in which mail is not delivered might have caused people to tend to deposit less mail on holidays." The response continues, "It might be that the Postal Service conducts the operations in question on holidays less extensively now than in the past because there is less mail being deposited."

- a. Please provide all documents, memos, and other information that provides the basis for these statements.
- b. Does the Postal Service believe that the data provided in USPS-LR-2 support these statements? If so, please explain how.
- c. Please confirm that the cancellation volumes reported in USPS-LR-2 will be affected by the number of collection boxes from which mail was collected on each holiday and the time of day at which each collection box was collected. If you do not confirm, please explain.

DFC/USPS-28. In USPS-LR-3, please refer to the Pacific Area memo dated October 27, 2000, concerning mail processing on Veterans Day.

- a. Please confirm that the Pacific Area expected "typical Saturday mail volumes" on Veterans Day, Saturday, November 11, 2000. If you do not confirm, please explain.
- b. Please confirm that the Pacific Area determined that processing plants would not cancel mail on Saturday, November 11, 2000. If you do not confirm, please explain.
- c. Please explain the reasons why the Postal Service apparently determined that a typical Saturday mail volume was insufficient to require plants in the Pacific Area to process outgoing mail on Veterans Day in 2000.

- d. Please confirm that the memo states that post offices must observe holiday collection schedules on November 11, 2000.
- e. Please explain how any holiday collection schedules on collection boxes in the Pacific Area could be consistent with the memo provided in response to DFC/USPS-3 given that plants in the Pacific Area would not be processing mail on Saturday, November 11, 2000.

DFC/USPS-29. In USPS-LR-1, please refer to the two headquarters memos describing operations for the Veterans Day and Christmas Day holidays in 2000 and the New Year's Day holiday in 2001.

- a. Please confirm that the memo concerning Christmas Day and New Year's Day waived, for that holiday period only, the requirement in POM § 125.22 that "consecutive days without collections should be avoided." If you do not confirm, please explain.
- b. Please confirm that the memo concerning Veterans Day implicitly, but not explicitly, waived the requirement in POM § 125.22 that "consecutive days without collections should be avoided." If you do not confirm, please explain.

DFC/USPS-30. Please refer to the response to DFC/USPS-13, which states that the Postal Service is unaware "of any year other than 1999" when Postal Service headquarters "expressly authorized" the practice of making the final collection from collection boxes on Christmas Eve prior to the posted collection time for the day of the week that corresponds to Christmas Eve. Please describe the process in years prior to 1999 for field offices to obtain permission or otherwise properly proceed to make the final collection from collection boxes on the eve of a holiday prior to the posted collection time for the day of the week that corresponded to the eve of the holiday.

DFC/USPS-31. Please refer to the response to DFC/USPS-14. Please provide all documents describing local adjustments to collection schedules relating to federal holidays, including local adjustments to collection schedules on the day or days preceding federal holidays.

DFC/USPS-32. Please refer to the response to DFC/USPS-14 and the headquarters memorandum in USPS-LR-1 dated June 23, 2000. Please confirm that neither the

Triboro District nor any other district was required to notify Postal Service headquarters of the plan to employ a Saturday collection schedule on Monday, July 3, 2000. If you do not confirm, please explain.

DFC/USPS-33. Please refer to the response to DFC/USPS-14. Please explain the function and role of field communication offices.

DFC/USPS-34. Please refer to the response to DFC/USPS-14. Does the Postal Service take the position that no early collections on eves of holidays occurred in years in the 1990's other than 1998 and 1999? Please explain.

DFC/USPS-35. Please refer to the responses to DFC/USPS-14 and -16.

- a. Please confirm that the Triboro District administers post offices located in the New York City boroughs of Brooklyn, Queens, and Staten Island. If you do not confirm, please explain.
- b. Please confirm that some collection boxes located in Flushing (Queens), New York, have weekday collections at 10 AM and 5 PM and a single Saturday collection at 10 AM. If you do not confirm, please explain.
- c. Please explain why the Postal Service could not have avoided "routine Monday operations" on Monday, July 3, 2000, by eliminating the *early* collection or collections on collection boxes that have multiple weekday collections and performing only the *final* posted weekday collection.
- d. Please confirm that no sign or announcement was posted at the main post office at 41-65 Main Street in Flushing, New York, on the afternoon of Saturday, July 1, 2000, informing customers that the collection boxes in Flushing would be collected on Monday, July 3, 2000, according to the posted Saturday collection time. If you do not confirm, please provide a copy of the sign or announcement and explain where the sign or announcement was posted.
- e. Does the Postal Service believe that media announcements in New York City concerning curtailed collections on Monday, July 3, 2000, obviated the need to post this information at the main post office in Flushing?

- f. Please provide a copy of each announcement that the Triboro District provided to the media concerning curtailed collections on Monday, July 3, 2000.
- g. Please provide a copy of every announcement that actually appeared in the media and a copy of which the Postal Service possesses.
- h. Please identify the media outlets that actually published information concerning curtailed collections.
- i. Please confirm that collection boxes located in La Guardia Airport and John F. Kennedy International Airport are under the jurisdiction of the Triboro District. If you do not confirm, please explain.
- j. Please confirm that observing a Saturday collection schedule in the Triboro District meant that some collection boxes that were accessible to the public on Monday, July 3, 2000, would not have been collected at all because some collection boxes located in the Triboro District are not scheduled for Saturday collections. If you do not confirm, please explain.

DFC/USPS-36. Please refer to the response to DFC/USPS-15.

- a. Does the Postal Service believe that posting a sign on every collection box notifying the public of curtailed collections would provide no better information to the public than media announcements and other communication methods that the Postal Service currently uses?
- b. Despite the limitations described in the response to DFC/USPS-15 of notices posted on every collection box, does the Postal Service believe that notices posted on every collection box in addition to media announcements would be more effective in informing most members of the public of curtailed collections than media announcements alone?

DFC/USPS-37. Please refer to the response to DFC/USPS-15, where the Postal Service states that "it is far from clear that a delay of two to three days under the circumstances described would necessarily be critical to most customers, or even to many customers."

- a. Please provide any studies, reports, or other documents that substantiate the assertion quoted in this interrogatory.
- b. Does the belief that a delay of two to three days in the delivery of First-Class Mail would not necessarily be critical to many or most customers reflect a general Postal Service philosophy concerning its responsibility to the public for delivering First-Class Mail?

DFC/USPS-38. Please refer to the response to DFC/USPS-15.

- a. Please confirm that Monday, July 3, 2000, was not a federal or postal holiday.
- b. Please explain the basis for the apparent Postal Service position that postal customers believe that holiday periods other than the Christmas season disrupt mail delivery on days other than the holiday itself.
- c. Please explain the basis for, and provide any reports, studies, or documents substantiating, the statement that “most mailers who deposit their mail late in the day on the eve of a major holiday either are not especially concerned with the time in which their mailpieces are delivered, or will tend to build in more of a cushion to accommodate routine holiday disruptions.”
- d. Does the Postal Service believe that most mailers who deposit their mail late in the day, but prior to the posted collection time corresponding to the day of deposit, are not especially concerned with the time required for their mail to be delivered? If yes, please explain, state the basis for, and provide any reports, studies, or documents substantiating this belief.
- e. Does the Postal Service believe that most mailers who are particularly concerned with the time required for their mail to be delivered will deposit their mail early in the day, rather than late in the day but prior to the posted collection time? If yes, please explain, state the basis for, and provide any reports, studies, or documents substantiating this belief.
- f. If the response to either part (d) or part (e) is no, please explain why mailer behavior changes on the eve of a major holiday so that mailers who are especially concerned with the delivery time of their mail will deposit their mail

early in the day, rather than late in the day but prior to the posted collection time corresponding to the day of deposit.

- g. Suppose a postal customer approached a Postal Service collection box in the Triboro District on Monday, July 3, 2000, at 4:50 PM. The posted weekday collection time was 5:00 PM, and the posted Saturday collection time was 10 AM. This customer did not see or hear any announcements from the Postal Service concerning curtailed collection times on Monday, July 3, 2000. Does the Postal Service believe that this customer should have thought that, perhaps, the Monday collection time would not apply on Monday, July 3, 2000, even though Monday, July 3, 2000, was not a holiday, and therefore, the customer should not have relied on the 5 PM collection time if he/she wanted the mail to be collected and processed on Monday, July 3, 2000?

DFC/USPS-39. Please refer to the response to DFC/USPS-15. Assuming most postal customers do not see their outgoing mail after it has been processed and delivered, please explain how the typical postal customer would be expected to determine that a mail delay caused by early collections on the eve of a holiday was caused by the early collections and not some other factor.

DFC/USPS-40. Please refer to the response to DFC/USPS-17. Please provide copies of all documentation submitted to Lizbeth Dobbins, manager, Customer Satisfaction Measurement, in response to the November 16, 1999, memo.

DFC/USPS-41. Please explain all reasons why the Postal Service requires field offices to notify customers in advance when collections will be performed earlier than the posted collection time.

DFC/USPS-42. Please refer to the Pacific Area memo in USPS-LR-3 dated June 21, 1999, concerning the Independence Day holiday in 1999.

- a. Please define a "Zero Bundle."
- b. Please explain why the Postal Service attempts to avoid zero bundles.
- c. Please explain why zero bundles, directly or indirectly, have a negative effect on customer service and satisfaction.

- d. The memo advises postal officials to “make sure all of your collection boxes are picked up as scheduled on July 2 and July 3.” The memo adds, “We do not want to experience a Zero Bundle prior to the holiday.” Would a zero bundle prior to the holiday create any consequences worse than a zero bundle on any other day? Please explain the apparent particular concern by the writer of the memo for avoiding a zero bundle prior to the holiday weekend.

DFC/USPS-43. Please refer to the response to DFC/USPS-14 and the November 17, 2000, memo in USPS-LR-1 from Postal Service headquarters concerning operations policy for the Christmas Day and New Year’s Day holidays. Please discuss whether the early collections performed on Saturday, December 23, 2000, in the Royal Oak District and the Appalachian District were consistent with Postal Service policy.

DFC/USPS-44. Please refer to the November 17, 1999, and November 18, 1999, memos in USPS-LR-1 concerning operations policy for the Christmas Day and New Year’s Day holidays.

- a. Please specifically define “late evening mail collections.” In your definition, please include the latest hour in the day that nevertheless would not constitute “late evening.”
- b. Please confirm that the term “late evening mail collections” is sufficiently ambiguous that field offices may have curtailed collections scheduled for hours earlier than Postal Service headquarters intended and earlier than the Postal Service defines in its response to part (a) of this interrogatory.

DFC/USPS-45. When field offices decide to perform collections on the eve of a holiday earlier than the time posted on collection boxes, is the final collection at some post offices, stations, and branches also performed at an earlier hour than the time posted on the collection receptacles?

DFC/USPS-46. The Pacific Area memos provided in USPS-LR-3 repeatedly state, for holidays when normal collection schedules will be observed, that “it is critical that our business customers and high volume mailers are made aware of our holiday collection efforts.”

- a. Is it not critical to inform postal customers who are not businesses or high-volume mailers?
- b. Please confirm that the Pacific Area does not take any steps to notify postal customers who are not businesses or high-volume mailers of holiday collection plans. If you do not confirm, please describe and provide documentation of these notification efforts.
- c. Please estimate the number of business and high-volume customers notified in the Pacific Area on each holiday on which normal collection schedules were observed and the approximate percentage of the mail volume on these holidays in the Pacific Area that these customers' mail comprised.
- d. Does the Pacific Area notify business customers who deposit most or all of their mail in Postal Service collection boxes or collection receptacles, or is the notification limited to customers who deliver their mail to the business mail entry unit or back dock of a post office or whose mail the Postal Service picks up from the mailer's facility? If the Postal Service notifies business customers who deposit most or all of their mail in Postal Service collection boxes or collection receptacles, please explain how the Postal Service notifies these customers, estimate the number of customers in the Pacific Area who receive this notification, and estimate the approximate percentage of the mail volume on these holidays in the Pacific Area that these customers' mail comprises.

DFC/USPS-47. Please refer to the discussion of plan failures in the response to DFC/USPS-18.

- a. Please explain in greater detail how the effort to reduce plan failures on the day after a holiday provides insight into the adequacy of collection and processing of outgoing mail on the holiday itself.
- b. Suppose a plant does not process outgoing mail on a holiday. Please confirm that, all else equal, the likelihood of a plan failure on the day following the holiday is directly proportional, as opposed to inversely

proportional, to the volume of mail that customers deposit on the holiday. If you do not confirm, please explain.

- c. Please refer to the memo in USPS-LR-3 dated May 11, 1998, concerning Pacific Area plans for the Memorial Day holiday. Please confirm that the occurrence of plan failures at six plants on the day after Memorial Day in 1997 tends to suggest that customers deposited a sufficient amount of mail on Memorial Day in 1997 to warrant collection and processing of outgoing mail on Memorial Day in 1998 in order to help to prevent plan failures on the day after Memorial Day in 1998. If you do not confirm, please explain.
- d. Please refer to the memo in USPS-LR-3 dated May 11, 1998, concerning Pacific Area plans for the Memorial Day holiday. Please discuss why plan failures might have occurred on the day after Memorial Day in 1997 given that arrangements were in place in the Pacific Area to process mail on Memorial Day in 1997. Might shortcomings have occurred in the scope or timing of mail collection on the holiday, thus reducing the amount of available mail that actually was collected and processed on the holiday?
- e. How many Pacific Area plants experienced plan failures on the day after Memorial Day in 1998, 1999, 2000, and 2001?

DFC/USPS-48. Please confirm that, from 1980 to 1987, most plants processed outgoing First-Class Mail on all holidays except Christmas Day and New Year's Day. If you do not confirm, please explain.

DFC/USPS-49. In the 1980's, did the Postal Service employ "Area Mail Processing" or consolidation plans on holidays whereby one plant, rather than processing its own outgoing mail, would send its outgoing mail to another plant for processing? If not, in which year did this practice begin?

DFC/USPS-50. Please refer to the data provided in USPS-LR-2. For 2000 and 2001, for all the plants that, according to the data, did not process outgoing First-Class Mail on holidays, please identify whether those plants sent their outgoing First-Class Mail to another plant for processing under an "Area Mail Processing" or consolidation plan and, if so, the plant to which they sent the mail.

DFC/USPS-51. Despite the data provided in USPS-LR-2, please confirm that:

- a. The P&DC's in Reno, Nevada, and Sacramento, California, did *not* process outgoing mail on Presidents' Day in 1995.
- b. The P&DC in Portland, Oregon, *did* process outgoing mail on Memorial Day in 1999.

DFC/USPS-52. Please refer to the response to DFC/USPS-14 and the headquarters memorandum in USPS-LR-1 dated June 23, 2000. Please describe any basis for not believing that as many as a majority of Postal Service collection boxes nationwide were collected on Monday, July 3, 2000, according to a Saturday collection schedule rather than a Monday collection schedule.

DFC/USPS-53. Please provide all reports, studies, literature, and other documents in the possession of Postal Service marketing staff or other staff that describe, either in specific terms or general conceptual terms, the number of times that an advertising or other message should run, and the frequency with which it should run, in order to reach particular or desired percentages of the audience, as well as the number of media outlets in which an advertising message should run in order to reach particular or desired percentages of the population.

DFC/USPS-54. Please confirm that the number of plants that processed outgoing First-Class Mail between 1992 and 2001 on holidays except Christmas Day and New Year's Day is lower than the corresponding number for most years from 1980 to 1987. If you do not confirm, please explain.

DFC/USPS-55.

- a. Please confirm that the cancellation volumes reported in USPS-LR-2 do not include the volume of First-Class Mail that was entered as presorted mail or mail bearing permit imprints.
- b. Please confirm that the cancellation volumes reported in USPS-LR-2 do not include the volume of metered First-Class letters that were mailed in trays or bundles and that bypassed the cancellation operation.

- c. Please confirm that the cancellation volumes reported in USPS-LR-2 do not include the volume of First-Class metered flats that bypassed the cancellation operation.
- d. Please explain whether the cancellation volumes reported in USPS-LR-2 include cancellation volumes for flats.
- e. Please confirm that plants that processed outgoing First-Class Mail on non-widely-observed holidays likely received a significant, if not substantial, volume of First-Class metered letters that were mailed in trays or bundles and that bypassed the cancellation operation.

DFC/USPS-56. Please identify any known instances of post offices making the final collection from collection boxes on the day after a holiday earlier than the final posted collection time for the day of the week that corresponds to the day after the holiday.

DFC/USPS-57. When post offices do not collect or process outgoing First-Class Mail on certain holidays, please describe the ways in which collection activities might differ on the day following the holiday compared to the collection activities that these post offices observe on days that do not follow a holiday. Please explain the reasons for these differing collection activities. Does the use of different collection activities on the day following the holiday depend on whether the holiday was a Monday holiday? If so, please explain how and why.

DFC/USPS-58. Please refer to the response to DFC/USPS-10, where the response states, "It is also possible, however, that reduced holiday operations have had an impact on the amount of mail being deposited, further reducing the need for holiday operations." On holidays in recent years when the Postal Service processed outgoing First-Class Mail, please confirm that the absence of a holiday collection time posted on most collection boxes may have caused a lower cancellation volume than the Postal Service might have experienced if collection boxes had shown a holiday collection time. If you do not confirm, please explain.